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September 18, 2014

United States Attorney
Eastern District of New York
610 Federal Plaza
Central Islip, NY 11722
Attn: AUSA James M. Miskiewicz
AUSA Saritha Komatireddy

RE: United States v. Philip Kenner & Tommy C. Constantine
Docket Number: 13-CR-607 (JFB)

Dear Mr. Miskiewicz and Ms. Komatireddy:

In furtherance of my letter of September 3, 2014, kindly contact me regarding a mutually convenient date, time and location to review with my client the original documents (Bates numbered DOC 1-14) containing “forged signatures” as alleged in your letter of August 29, 2014. In addition, I request that you make available my client’s MacBook computer in an operational condition in order that I as well as my client may review select documents contained on the computer.

The instant request is not only premised on my unanswered letter of September 3, 2014 but also on your letter of September 12, 2014, as filed with the court, in which you write “Insofar as you wish to inspect the originals of any documents received, the government is prepared to make such materials available for you and the defendant’s inspection at the United States Attorney’s Office in Central Islip.”

I would prefer to inspect the aforementioned original documents “sooner rather than later” and look forward to your timely reply.

Very truly yours,

Richard D. Haley

RICHARD D. HALEY